
EXHIBIT 2



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00375.115

March 15, 2016

Via Facsimile and U.S. Mail

ChemTreat, Inc.
5640 Cox Road
Glen Allen, VA 23060

Re: Notice of Claim
Date of Accident: December 24, 2015
Property: Valley Proteins, Inc.
22528 Lankford Hwy.
Accomac, VA 23301

Dear Sir/Madam:

We represent Mid-South Steam Boiler & Engineering Company, Inc. in connection with the above-referenced incident. On December 24, 2015, an explosion occurred at a Valley Proteins facility in Accomac, Virginia, causing extensive damage. We also understand that an individual may have been injured in the explosion. We have been placed on notice of potential subrogation claims by various insurance carriers for Valley Proteins, alleging that a pressure vessel manufactured by Mid-South was involved in the explosion. It is our understanding that you may have inspected, tested, and/or serviced the boiler system associated with the pressure vessel. Accordingly, we are writing to place you on notice of potential claims Mid-South may have against you, including, but not limited to, claims for indemnity and/or contribution.

Please be advised that investigation is ongoing. Valley Proteins owns and controls the accident site. We understand that Valley Proteins is storing/will store certain items for future inspection as it removes debris from the site. Valley Proteins has set dates for interested parties to inspect the site and debris. The next two dates are March 17 and March 24, with inspections scheduled to begin at 7:00 a.m. at the Accomac facility. Should you wish to perform or attend the inspection, the contact at Valley Proteins is Rodney White, Director of Treasury Operations. His email address is rwhite@valleyproteins.com and his telephone number is 540-877-2092 x10371. Additionally, the attorneys for the subrogation carriers are Samuel Pace of Dugan Brinkmann Maginnis and Pace, telephone: 215-563-3500, email: sjpace@dbmplaw.com; and Daniel Theveny of Cozen O'Connor, telephone: 215-665-4194, email: DTheveny@cozen.com.

Reply to Norfolk Office

440 MONTICELLO AVENUE SUITE 2200 NORFOLK, VA 23510 757.628.5500 FACSIMILE 757.628.5566
222 CENTRAL PARK AVENUE SUITE 1500 VIRGINIA BEACH, VIRGINIA 23462 757.628.5600 FACSIMILE 757.628.5659

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Willcox & Savage

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Please forward this letter to your insurance carriers and place them on notice of these potential claims. Additionally, we request that you preserve all evidence and potentially relevant or discoverable documents, items, or information, whether in paper or electronic form, related to the above-referenced incident, the pressure vessel, deaerator, boilers, or the system(s) associated therewith, and any materials, products, and/or services you supplied or provided, including, but not limited to, all contracts, receipts, purchase orders, instructions, warnings, inspection reports, maintenance records, boiler service reports, cooling service reports, testing and quality control protocols, test data and results, incident reports, policies, procedures, training materials, videos, pictures, e-mails, or other tangible items.

If you have any questions, please feel free to contact me.

Sincerely,



Brian W. Lown

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